



Results of the Performance Of Mitigations to Protect Listed Species ESA Effects – as of 9/25		
Mitigation	Registrant ESA Option	Best ESA Option All Mitigations
Spray Drift Buffer (ft)	240	310
Omnidirectional Buffer (ft)	57	57
Buffering Agent	Yes - same as FIFRA	Yes- same as FIFRA
Cut-Off Date	Yes- same as FIFRA	Yes – same as FIFRA
Protection Certainty Spray drift ≥ 95%	95	95
Protection Certainty Volatility ≥ 95%	95	95
Addresses Incident and Wide Area	Yes	Yes
Number of Impacted Counties as of This Date (total 2671)*	210	290
Percent Soy Acres Impacted in ESA Counties as of This Date	10	13
Percent Cotton Acres Impacted in ESA Counties as of This Date	11	15

*county counts rounded to two significant figures

Discussion Draft – 9/25